5.2.3.2.3 Plant Site Direct Wetland Effects Impacts

PolyMet proposes to reuse the former LTVSMC processing plant and Tailings Basin. The processing plant is located on uplands with no wetland resources present. The existing constructed plant reservoir located east of the concentrator is not regulated as a wetland. Therefore, no direct wetland effects-impacts are anticipated in this portion of the Plant Site.

Direct wetland <u>effects impacts</u> would result from the following Plant Site components: construction of the Tailings Basin, pump station, treated water discharge pipelines, flotation tailings pipeline, Tailings Basin containment system to manage Tailings Basin seepage, rock buttress for stability along the north and east sides of Cell 2E, drainage swale and overflow channel located northeast of Cell 2E, and the Hydrometallurgical Residue Facility.

Direct wetland effects impacts within the Plant Site would total 147-184 acres. These wetlands effects impacts would be caused by fill (12 percent), excavation (31 percent), excavation and fill (less than one percent), and the containment system (58 percent), and therefore, these wetlands would be permanently lost. Table 5.2.3-8 summarizes the directly affected impacted wetlands within the Plant Site by community type while Table 5.2.3-9 identifies the activity that causes the effects impacts expected within the Plant Site. The majority of the wetlands (945 percent) that would be affected impacted are rated as low quality and 6-7 percent are rated as moderate quality wetlands.

The rock buttress described in Section 3.2.3 and Section 4.2.13 would abut the existing toe of the Tailings Basin. The water containment system would extend approximately 300 ft around the northern and western sides, and portions of the eastern sides of the Tailings Basin, encapsulating the Tailings Basin, the rock buttresses and wetlands between it and the rock buttresses. Construction of the Tailings Basin for the NorthMet Project Proposed Action would also result in expansion of the existing eastern footprint onto natural highland. The majority of the affected impacted wetlands are rated as low quality, primarily because the hydrology supporting these wetlands has been modified by seepage from the Tailings Basin and other drainage modifications made in the area (PolyMet 2015b3b). These hydrologic modifications have resulted in inundation and changes in wetland cover types from forested and scrub shrub wetlands (as evidenced in aerial photographs from the 1940s prior to LTVSMC operations) to deep marsh (Barr 2008b).

Wetlands located outside of the Cliffs Erie Permit to Mine Ultimate Tailings Basin boundary (this boundary is shown on Figure 5.2.3-18 and Figure 5.2.3-19) but within the Hydrometallurgical Residue Facility are included in the direct wetland effects-impact analysis. As previously noted, approximately 28.6 acres of wetlands in the Hydrometallurgical Residue Facility are not subject to state or federal regulations as they are located within an actively permitted waste storage facility. Two wetlands located in the Hydrometallurgical Residue Facility are subject to state or federal regulation covering 7.5 acres and would be directly affected-impacted by fill. Both wetlands are shallow marsh wetlands (see Figure 5.2.3-19).

There would be no direct wetland <u>effects impacts</u> along the Colby Lake Water Pipeline Corridor <u>or in the Second Creek area</u>, as there would be no construction within <u>this corridorthese two</u> areas.

Table 5.2.3-8 Total Projected Direct Wetland Effects-Impacts for the Plant Site

	Directly Affected-Impacted Wetlands at the Plant Site		
m . m . ov . 1		0.4	No. ²
Eggers and Reed Class ¹	Acres	%	
Coniferous bog	0.0	0	0
Coniferous swamp	10.7	7	3
Deep marsh	73 <u>74</u> .4 <u>0</u>	50	14
Hardwood swamp	0.9 <u>7</u>	<u>0≤1</u>	91
Open bog	0.0	0	0
Open water (includes shallow, open water, and lakes)	0.0	0	0
Sedge/wet meadow	1.45	1	<u>56</u>
Shallow marsh	52.7	36	1 <u>3</u> 4
Shrub swamp (includes alder thicket and shrub-carr)	8.9	6	6
Total Direct EffectsImpacts	447 <u>148,14</u> 7	100	4244

Source: PolyMet 2015b3b.



¹ Eggers and Reed 1997.

There are 44 unique wetlands directly impacted at the Plant Site, which includes the Tailings Basin and Hydrometallurgical Residue Facility footprint. One wetland (ID 1155) has been split between the Tailings Basin and Hydrometallurgical Residue Facility footprint in the Wetland Data Package for a total of 45 wetlands directly impacted in Wetland Data Package report.

Figure 5.2.3-18 Tailing Basin Wetlands and Direct Wetland Impacts



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Figure 5.2.3-19 Hydrometallurgical Residue Facility Wetlands and Direct Wetland Impacts



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Table 5.2.3-9 Type of Projected Direct Wetland Effects-Impacts at the Plant Site

		Directly Affected Impacted Wetlands at the Plant Site		
			No. ¹	
Type of EffectImpact	Acres	%		
Fill	17.0 <u>6</u>	12	46 <u>17</u>	
Excavation	45.2	31	1	
Fill and Excavation	0.2	<1	1	
Containment System	84.7 <u>5.4</u>	58	<u>264</u>	
Total Direct EffectsImpacts	147.18.4	100	42 <u>45</u>	

Source: PolyMet 2015b3b.

There are 44 unique wetlands directly impacted at the Plant Site, which includes the Tailings Basin and Hydrometallurgical Residue Facility HRF-footprint. One wetland (ID 1155) has been split between the Tailings Basin and Hydrometallurgical Residue Facility footprint in the Wetland Data Package for a total of 45 wetlands directly impacted in Wetland Data Package report. This wetland-would result in wetland-impacts on wetlands as a result of filling at the Hydrometallurgical Residue Facility and wetland effects as a result of placement of the containment water as the Tailings Basin.

